REMARKS

Reconsideration and allowance of the present application are requested. Claims 1-24 remain pending in the application. By the foregoing amendment, claims 1, 9 and 19 are amended.

In numbered paragraph 3 of the final Office Action, the Examiner objects to claim 19. Claim 19 is amended to obviate the objection. Withdrawal of the objection to the claim is respectfully requested.

In numbered paragraph 4 of the final Office Action, the Examiner rejects claims 1-24 under 35 U.S.C. §112, second paragraph. To address the Examiner's concerns, the relevant claims (claims 1, 9 and 19) are amended. For example, claim 1 is amended to recite "modify a separation distance between two particular text clusters in said electronic document to create a distinct document layout of said electronic document." Withdrawal of the rejection under 35 U.S.C. §112, second paragraph, is respectfully requested.

In numbered paragraph 5 of the final Office Action, claims 1, 9 and 19, along with all dependent claims, are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,424,971 B1 (Kreulen et al.) in view of U.S. Patent No. 6,542,635 B1 (Hu et al.). This rejection is respectfully traversed.

Applicants have disclosed a document composition device comprising a processor and a memory communicating with the processor. As exemplified in Applicants' Figure 1, the memory 120 includes a document storage area 122 storing one or more electronic documents and a distance modifier routine 133. The processor 110 uses the distance modifier routine 133 to modify a separation distance between two particular text clusters in an electronic document (e.g.,

paragraph [0018]). Distinct from prior art classification and analysis, the disclosed document composition device modifies a document layout to create a distinct document layout of an electronic document (e.g., paragraphs [0014]). For example, the distance modification can create a layout differentiation that is small enough to be difficult to discern with the human eye, but being of sufficient differentiation for discrimination by a computerized system comparing documents (e.g., paragraphs [0068]).

The foregoing features are broadly encompassed by the independent claims 1, 9 and 19. For example, claim 1 recites a document composition device, comprising: a processor; and a memory communicating with said processor and including a document storage area storing one or more electronic documents and a distance modifier routine, with said processor using said distance modifier routine to modify a separation distance between two particular text clusters in said electronic document to create a distinct document layout of said electronic document.

Regard the Kreulen et al. patent, the Examiner admits "Keulen does not specifically teach 'generating a distance adjustment'." Moreover, instead of being directed to creating a distinct document layout of an electronic document, the Kreulen et al. patent is directed to a system and method for interactive classification and analysis of textual data in a given format, e.g., email message or trouble ticket (abstract; col. 3, lines 38-42). Accordingly, the Kreulen et al. patent does not teach or suggest, among other features, modifying a separation distance between two particular text clusters in said electronic document to create a distinct document layout of said electronic document, as recited in claim 1.

The Hu et al. patent fails to overcome the deficiencies of the Kreulen et al. patent. The Hu et al. patent is directed to a method for document comparison and classification (title). The Hu et al. patent achieves document classification by identifying a pre-existing layout information using fixed length interval vectors (abstract). The document comparison and classification as disclosed by the Hu et al. patent relate to identification and measurement of layout features (e.g., col. 3, lines 5-14, 32-36 and 58-62), but the Hu et al. patent does not related to modifying text clusters to create a distinct document layout. Accordingly, the Hu et al. patent does not teach or suggest modifying a separation distance between two particular text clusters in said electronic document to create a distinct document layout of said electronic document, as recited in claim 1.
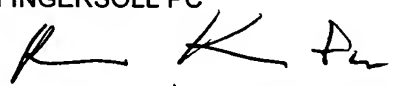
The Kreulen et al. patent and the Hu et al. patent, considered individually or in the combination relied upon by the Examiner, fail to teach or suggest modifying a separation distance between two particular text clusters in said electronic document to create a distinct document layout of said electronic document. As such, claim 1 is allowable. Independent claims 9 and 19 are allowable for similar reasons.

Thus, independent claims 1, 9 and 19 are allowable over the Kreulen et al. patent and the Hu et al. patent. The remaining claims depend from the aforementioned independent claims and recite additional advantageous features which further distinguish over the documents relied upon by the Examiner. As such, these claims are also considered allowable.

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the application is in condition for allowance and a Notice of Allowance is respectfully solicited.

Respectfully submitted,

BUCHANAN INGERSOLL PC

Date: <u>December 23, 2005</u>   By: _____
Patrick C. Keane
Registration No. 32,858

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620

VA 824053.1